

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Andrew I. Kossman	:	Case No. 18-16771-ELF
Debtor	:	Chapter 13
_____	:	
Wilmington Savings Fund Society, FSB, d/b/a	:	
Christiana Trust, not individually but as Trustee	:	
for Pretium Mortgage Acquisition Trust	:	
Movant	:	
v.	:	
Andrew I. Kossman	:	
Debtor	:	
and	:	
William C. Miller, Esq.	:	
Trustee	:	
_____	:	

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor, Andrew I. Kossman, by his attorney John M. Kenney, hereby files an Objection to the Certification of Default filed by Kevin G. McDonald, Esquire, attorney for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as Trustee for Pretium Mortgage Acquisition Trust and in support thereof asserts the following:

1. On September 27, 2019, the attorney for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as Trustee for Pretium Mortgage Acquisition Trust, filed a Certification of Default with the Court pursuant to the stipulation approved by the Court on May 17, 2019.
2. Attorney for Debtor advised the Debtor of the Certification.
3. Debtor has remitted payments to Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as Trustee for Pretium Mortgage Acquisition Trust, during the alleged period of default and has the present ability to cure any remaining delinquency.

**WHEREFORE**, Debtor, Andrew I. Kossman, prays that this Court will grant a hearing on the matter and hold in abeyance its decision regarding the Moving party's request to modify the stay.

Date: September 30, 2019

/s/ John M. Kenney  
JOHN M. KENNEY, ESQUIRE  
308 N. Oxford Valley Road  
Fairless Hills, PA 19030  
(215) 547-3031